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Attorney for Defendant Shannon Blaylock

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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COMES NOW defendant Shannon Blaylock and submits the following pretrial conference statement pursuant to N.D. Cal. Local Crim. Rule 17.1-1(b).

(1) Disclosure and contemplated use of statements or reports of witnesses under the Jencks Act, 18 U.S.C. § 3500, or FRCrimP 26.2.

None.

(2) Disclosure and contemplated use of grand jury testimony of witnesses intended to be called at the trial.

Please see defendants' motion to compel grand jury testimony of alleged victim identified as "V.S." in the indictment filed concurrently herewith.

(3) Disclosure of exculpatory or other evidence favorable to the defendant on the issue of guilt or punishment.

1 Not applicable to defendant's disclosure obligations.

2 (4) **Stipulation of facts which may be deemed proved at the trial without further proof by either party and limitation of witnesses.**

3 None at this time.

4 (5) **Appointment by the Court of interpreters under FRCrimP 28.**

5 Not applicable.

6 (6) **Dismissal of counts and elimination from the case of certain issues, e.g., insanity, alibi and statute of limitations.**

7 None.

8 (7) **Joinder pursuant to FRCrimP 13 or the severance of trial as to any co-defendant.**

9 Not applicable.

10 (8) **Identification of informers, use of lineup or other identification evidence and evidence of prior convictions of defendant or any witness, etc.**

11 Not applicable to defendant's disclosure obligations.

12 (9) **Pretrial exchange of lists of witnesses intended to be called in person or by deposition to testify at trial, except those who may be called only for impeachment or rebuttal.**

13 Not applicable to defendant's disclosure obligations.

14 (10) **Pretrial exchange of documents, exhibits, summaries, schedules, models or diagrams intended to be offered or used at trial, except materials that may be used only for impeachment or rebuttal.**

15 None at this time.

16 (11) **Pretrial resolution of objections to exhibits or testimony to be offered at trial.**

17 Defendant has not been informed by the Government of what it intends to offer sufficient to respond to this item.

18 (12) **Preparation of trial briefs on controverted points of law likely to arise at trial.**

19 See motions in limine filed concurrently herewith.

20 (13) **Scheduling of the trial and of witnesses.**

21 Not applicable to defendant's disclosure obligations.

22 (14) **Request to submit questionnaire for prospective jurors pursuant to Crim.. L.R. 24-1, voir dire questions, exercise of peremptory and cause challenges and jury instructions.**

23 See defendant's proposed voir dire questions and proposed jury instructions filed

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1 concurrently herewith.

2 **(15) Any other matter which may tend to promote a fair and expeditious trial.**

3 None at this time.

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6 DATED: August 13, 2008

Respectfully submitted,

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By

/s/ Michael Stepanian

Michael Stepanian
Attorney for Defendant
Shannon Blaylock

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